

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ABDULMOKNE GHALEB,

Plaintiff,

v.

Case No. 2: 13-CV-13822-SJM-MKM
Hon. Stephen J. Murphy, III

AMERICAN STEAMSHIP COMPANY,

Defendant.

_____ /

JOINT DISCOVERY PLAN

1. Pursuant to Fed.R.Civ.P. 26(f), the parties jointly propose to the Court the following discovery plan:

A. Stipulations re Rules 26(a)(1) and 26(a)(2)(B):

Pursuant to Rule 26(a)(1)(c) the parties have stipulated to different times for the initial disclosures to be exchanged.

Pursuant to Rule 26(a)(2)(B) the parties have stipulated out of the disclosure requirements of 26(a)(2)(B) by unanimous agreement as follows:

1. The parties shall disclose the identity of their 26(a)(2) expert witnesses (name, address and area of expertise) no later than April 1, 2014;
2. The parties shall produce written reports from all of their expert witnesses (which shall contain all of the information required by 26(a)(2)(B) or a statement by the expert that he or she does not have and cannot reasonably obtain the information required by

the Rule) no later than November 21, 2014; Medical treaters are not required to file 26(a)(2) expert reports.

3. Each party is permitted to name rebuttal experts in areas of expertise in which said party has not previously identified an expert and the opposing party has previously identified and disclosed an expert in said area of expertise. Said rebuttal experts shall be identified pursuant to Rule 26(a)(2) no later than May 1, 2014.

2. Deadline for Rule 26(a)(1) Initial Disclosures: December 2, 2013
3. Deadline for amendment of pleadings: November 19, 2013
4. Date for filing Preliminary Witness List: February 14, 2014
5. Discovery cutoff: November 4, 2014
6. Expert discovery depositions (including treaters) completed by: December 30, 2014;
7. Final Witness List: September 15, 2014;
8. Dispositive Motion deadline: November 4, 2014
9. Final Pre-Trial Conference: _____
10. Trial: _____

B. Electronically stored information:

With respect to disclosure or discovery of electronically stored information, the parties do not anticipate any issues regarding the same in this action. If an issue does arise as to disclosure or discovery of electronically stored information, the parties will attempt to resolve the issue in accordance with the Federal Rules of Civil Procedure before seeking the Court's intervention.

ABDULMOKNE GHALEB and AMERICAN STEAMSHIP COMPANY agree to comply with their obligations under Rule 26 regarding electronically stored information.

C. Privileges and Trial Preparation Material:

The parties do not seek an order at this time regarding claims of privilege or claims of protected trial preparation material asserted after production. If an issue does arise as to claims of privilege or claims of protected trial preparation material, the parties will attempt to resolve the issue before seeking the Court's intervention.

D. Discovery Stipulations:

Maximum of **50** interrogatories by each party to each other party.
Responses due **30** days after service.

Maximum of **25** requests for admissions by each party to each other party.
Response due **30** days after service.

Maximum of **20** discovery depositions by ABDULMOKNE GHALEB, and **20** discovery depositions by AMERICAN STEAMSHIP COMPANY.*

***The maximum deposition limitations apply to "discovery only depositions."**

Each deposition limited to a maximum of 7 hours unless extended by agreement of the parties.

/s/ D. Bruce Beaton

D. Bruce Beaton (MI Bar P32704)

Attorney for Plaintiff

137 S. Water Street

Marine City, MI 48039

(810) 765-3333 / Fax: (810) 765-4026

dbb@dbbeatonlaw.com

/s/ Paul D. Galea

PAUL D. GALEA (MI Bar P29250)

Foster, Meadows & Ballard, P.C.

Attorney for Defendant

607 Shelby, 7th Floor

Detroit, MI 48226

(313) 961-3234 / Fax: (313) 961-6184

pgalea@fostermeadows.com

00126819.DOCX